REMARKS

The above-identified patent application has been amended and Applicants respectfully request the Examiner to reconsider and again examine the claims as amended.

Claims 1-62 are pending in the application. Claims 1-62 are rejected. Claims 1, 12, 33, 41, and 53 is amended herein.

Applicant's attorney would like to thank Examiner Wozniak for the courtesy extended to Applicant's attorney during a telephone interview on March 30, 2005. The rejection of Claim 1 set forth in paragraph 4 of Office action was discussed in view of the cited references by Hiroya et al. (U.S. Patent No. 6,112,304) and Clawson (U.S. Patent Number 5,751,957). The system of Hiroya was discussed in general. The claimed "distributed object protocol" was discussed. The rejection of Claim 14 was also discussed, as was the claimed "object." A reference by Kleinman et al. (U.S. Patent No. 5.724,503), which was described by the Examiner to be in a field of analogous art, was also discussed. During the telephone interview, the Examiner suggested claim amendments, which Applicants subsequently submitted to the Examiner as a Draft Amendment attached to an email dated April 1, 2005. On April 6, 2005, the Examiner replied by email stating that while the amended claims would overcome the prior art of record, the amended claims would not be entered since further search and/or consideration would be necessary. The suggested claim amendments are made herein.

The Rejections under 35 U.S.C. §103(a)

Hiroya et al. in View of Clawson

The Examiner rejects Claims 1, 5-13, 15, 17, 24, 33, 38, 41, 44, 47, 50-53, and 58-60 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. (U.S. Patent number 5,751,957) in view of Clawson (U.S. Patent number 6,112,304). With regard to Claim 1, the Examiner asserts that Hiroya et al. discloses a client for sending a translation request and for receiving a response, and a translation engine for receiving the translation request, as set forth in Claim 1.

The Examiner recognizes that Hiroya et al. does not teach "...that the translation is requested, transmitted, and received using distributed object protocol... ." The Examiner relies upon Clawson as teaching " ...a means of implementing a natural language translation over a network using distributed object protocol... ." The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to modify the teachings of Hiroya with the use of an distributed object protocol in a network-based natural language translation application as taught by Clawson ... ."

As the Examiner is aware, and as found in MPEP §2142, in order to establish a prima facie case of obviousness "...the prior art reference (or prior art references when combined) must teach or suggest all the claim limitations." Applicants respectfully submit that the Examiner has not met this burden in order to establish prima facie obviousness.

Applicants submit that amended Claim 1 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson, since the cited references neither describe nor suggest "...[a] translation system, comprising: (a) *a client for sending a translation request using a distributed object protocol, the translation request comprising text to be translated*, the client also for receiving a response to the request using *the distributed object protocol* corresponding to a translation of the text from a first natural language to a second natural language; and (b) a translation engine for receiving the translation request using *the distributed object protocol* and for generating the response and sending the response to the client using the distributed object protocol, *wherein the distributed object protocol comprises a standard governing software objects and further governing communication between the software objects*," as set forth in amended Claim 1.

The present invention uses a distributed object protocol as claimed. The term "distributed object protocol" is given particular meaning throughout the specification, for example, from page 10, line 1 to page 11, line 30.

For example, as described in conjunction with FIG. 1 at page 10, lines 1-3, the specification states "[t]he distributed object protocol with which the element 11 and the translation engine 16 communicate is *a standard governing the creation of and communication between objects and distributed objects* (objects that communicate with objects on other network nodes)." Also, as described, for example, at page 10, lines 6-9, the specification states "[a] software object is a collection of related functions (or intelligence) and the function's (or intelligence's) associated state. A set of distributed objects, such as a set including all of the objects in Fig. 2 (the client 11, translation engine 16, dictionary browser 46, etc.), is a collection of independently operating nodes."

The Examiner recognizes that Hiroya et al. does not teach the claimed distributed object protocol. The Examiner uses Clawson to teach a distributed object protocol, citing Clawson in his Office Action at "(ODE, Col. 21, line 16-Col. 23, Line 65, Col. 24, Line 61, and Fig 10)." Contrary to the Examiner's assertion, Applicants can find no mention in Clawson of a distributed object protocol. With regard to FIG. 1 of Clawson, the ODE is described at column 7, lines 9-10 as "[t]he 'denizon' processes 100, also known as 'Organic Data Elements' or 'ODEs' ... ." Furthermore, at column 7, lines 11-12, Clawson describes that "...denizons can move along paths 106 between locations 104... ." Therefore, Clawson describes software "denizens" that can move from one place to another on a network. At column 24, line 62, Clawson describes "a distributed process," and at column 6, lines 35-36, Clawson describes a "distributed computing system architecture." Applicants submit that the distributed process and the distributed computer architecture of Clawson are not a distributed object protocol as claimed. Applicants thus submit that Clawson fails to describe or suggest the claimed *distributed object protocol, which comprises a standard governing software objects and further governing communication between the software objects*. Applicants also submit that Clawson fails to describe or suggest distributed objects.

Furthermore, as described above, Applicants submit that Claim 1 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson, since the cited

references neither describe nor suggest the "...a client for sending a *translation request*, ...*the translation request* comprising text to be translated... ," as set forth in Claim 1.

The Examiner asserts that "...Hiroya et al. discloses...a client for sending a translation request..., the translation request comprising text to be translated..., the client also for receiving a response to the request corresponding to a translation of the text from a first natural language to a second natural language... ." Applicants respectfully disagree with the Examiner's assertion.

Hiroya describes, for example, at column 7, line 63 to column 8, line 26:

> "Initially, a service offerer resident in U.S.A prepares or generates a display structure description 62 illustrated in FIG. 6 on the basis of a screen display 52 for the service clients located or resident in U.S.A. The display structure description 62 as generated is stored in the storage unit 13 incorporated in the service server 1. At this juncture, it should be mentioned that a display structure description 63 translated previously into an information expressing form such as illustrated in FIG. 7 may be stored in the storage unit 13 in place of the display structure description 62. When a Japanese consumer makes access to the service server 1 from the service client 2 via the communication network 4, then the service server 1 responds thereto by translating the display structure description 62 into the display structure description 63 of an intermediate expression form with the aid of the translation processing unit 15. Of course, when the display structure description 63 of the intermediate expression form has previously been stored in the storage unit 13, the translation processing mentioned above is rendered unnecessary. The display structure description 63 of the intermediate expression form is then sent to the consumer or customer in Japan. Upon reception of the display structure description 63, the service client 2 translates the display structure description 63 into a Japanese-bound display structure description 61 illustrated in FIG. 5 with the aid of the translation processing unit 24. In succession, the service client 2 generates a display 51 for Japanese in the input/output processing unit 22, as illustrated in FIG. 3."

Therefore, Hiroya et al. teaches a system that, upon a user request (a command), converts a "display structure description" (e.g. 62, FIG. 6), into a "display structure description" (e.g. 63, FIG. 7), into a "display structure" (e.g., 61, FIG. 5), and then into a display (e.g., 51, FIG. 3). Therefore, the request of Hiroya et al. is a user command. Hiroya et al. fails to describe or suggest "...a client for sending a translation request, ...***the translation request comprising text to be translated***... ," as claimed.

In view of the above, Applicants submit that Claim 1 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson.

Claims 5-13, 15, 17, and 24 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 5-13, 15, 17, and 24 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Applicants have amended Claim 12. Applicants submit that amended Claim 12 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "...the translation request further comprises at least one of the following : part-of speech setting, annotation, HTML markup ; SGML markup, RTF markup, NROFF markup, translation option, alternate word setting, alternate translation, sentence-end annotation, translation hint, and an indicator of discontinuities in the text," as set forth in amended Claim 12.

Applicants submit that Claim 17 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "...*the distributed object protocol* used by the client and the translation engine supports the translation engine and a plurality of other translation engines," as set forth in Claim 17.

Applicants submit that Claim 24 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "... a script-enabled application for calling *a synchronous translator*, wherein text in the application can be translated by providing script in the application that calls the synchronous translator *using a distributed object protocol*," as set forth in Claim 24.

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that amended Claim 33 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson, since the cited references neither describe nor suggest "...[a] translation method, comprising : (a) sending a translation request from a client to a translation

engine *using a distributed object protocol, the translation request comprising text to be translated from a first natural language to a second natural language* ; (b) receiving, at the translation engine, the request *using the distributed object protocol* ; (c) performing, at the translation engine, a translation of the text from the first natural language to the second natural language in response to the received translation request, said translation producing a response corresponding to the translation of the text from the first natural language to the second natural language ; and (d) sending the response from the translation engine to the client *using the distributed object protocol, wherein the distributed object protocol comprises a standard governing software objects and further governing communication between the software objects*," as set forth in amended Claim 33.

Claim 38 depends from and thus includes the limitations of Claim 33. Thus, Applicants submit that Claim 38 is patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 33.

Applicants submit that Claim 38 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "... scanning the translation request for at least one irregularity in the text prior to performing a translation, the irregularity selected from the group including undefined word, undefined string, undefined character, spelling error, and punctuation error," as set forth in Claim 38.

With regard to Claim 38, the Examiner asserts "...official notice that it is well know in the art to detect and correct spelling errors before any text based searching operation is performed... ." The Examiner concludes that "...it would have been obvious to one of ordinary skill in the art, at the time of invention, to detect the presence of spelling errors for correction before translation... ." Applicants respectfully disagree.

In his above assertion, the Examiner provides no documentary evidence for the official notice. As the Examiner is aware, according to MPEP §2144.03, "...[o]fficial notice unsupported by documentary evidence should only be taken by the examiner where the facts asserted to be

well-known, or to be common knowledge in the art are capable of instant and unquestionable demonstration as being well known." Applicants submit that the claimed *translation method* for which a translation request is scanned for at least one of an undefined word, an undefined string, an undefined character, a spelling error, and a punctuation error is not well known, and thus, official notice is improper. Applicants request documentary evidence.

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that amended Claim 41 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson, since the cited references neither describe nor suggest "...[a] translation system comprising : (a) a plurality of translation engines, each translation engine for receiving a translation request *using a distributed object protocol* and for generating a response and forwarding the response to the translation request *using the distributed object protocol, the translation request comprising text to be translated from a first natural language to a second natural language*, and the response comprising a translation of the text from the first natural language to the second natural language ; and (b) a client for sending the translation request to any of the plurality of translation engines *using the distributed object protocol* and for receiving the response from that translation engine *using the distributed object protocol, wherein the distributed object protocol comprises a standard governing software objects and further governing communication between the software objects,*" as set forth in amended Claim 41.

Claims 44, 47, and 50-52 depend from and thus include the limitations of Claim 41. Thus, Applicants submit that Claims 44, 47, and 50-52 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 41.

Applicants submit that Claim 44 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "... the client further comprises a user interface having a translation service for accepting translation requests and wherein *the distributed object protocol used by the client and the plurality of translation engines to communicate supports a plurality of translation engines*," as set forth in Claim 44.

Applicants submit that Claim 47 is further patentably distinct over Hiroya et al. and Clawson, since the cited references neither describe nor suggest "... *the translation request further comprises information relating to a desired format of the translation* so that the translation engine that receives the translation request can generate the response in accordance with the information using *the distributed object protocol*," as set forth in Claim 47.

For substantially the same reasons described in conjunction with Claim 1, Applicants submit that amended Claim 53 is patentably distinct over Hiroya et al., whether taken alone or in combination with Clawson, since the cited references neither describe nor suggest "...[a] translation system, comprising : (a) a plurality of clients, each for sending a translation request *using a distributed object protocol* to at least one translation engine and each for receiving a response to the translation request *using the distributed object protocol, the translation request comprising text to be translated from a first natural language to a second natural language and the response corresponding to a translation of the text from the first natural language to the second natural language* ; and (b) a translation engine for receiving at least one translation request from any one of the plurality of clients *using a distributed object protocol* and for generating a response and forwarding the response to the request to that client *using the distributed object protocol, wherein the distributed object protocol comprises a standard governing software objects and further governing communication between the software objects*," as set forth in amended Claim 53.

Claims 58-60 depend from and thus include the limitations of Claim 53. Thus, Applicants submit that Claims 58-60 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 53.

In view of the above, Applicants submit that the rejection of Claims 1, 5-13, 15, 17, 24, 33, 38, 41, 44, 47, 50-53, and 58-60 under 35 U.S.C. §103(a) should be removed.

Hiroya et al. in View of Clawson and Kleinman et al.

The Examiner rejects Claims 2-4, 14, 16, 18-23, 34-37, 40, 42-43, 45-46, 48, 54-57, and 61-62 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. in view of Clawson and further in view of Kleinman et al. (U.S. Patent number 5,724,503). The Examiner recognizes that "Hiroya does not teach that a translation request and response is sent in accordance with an interface definition language... ." The Examiner relies upon Kleinman et al. to teach the interface definition language. The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to modify the teachings to Hiroya in view of Clawson with the use of IDL in sending a translation request and response as taught by Kleinman ... ."

Claims 2-4, 14, 16, and 18-23 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 2-4, 14, 16, and 18-23 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Applicants submit that Claim 3 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "[a] translation system..." for which "... the *distributed object protocol* used by the client and the translation engine operates in accordance with *the Component Object Model (COM) standard*," as set forth in Claim 3.

With regard to Claim 3, the Examiner asserts "official notice that the COM standard is well know in the art for distributed systems ... ." The examiner concludes that "...it would have been obvious to one of ordinary skill in the art, at the time of invention, to operate the distributed object protocol taught by Clawson according to the well known and commonly used COM standard... ." Applicants respectfully disagree.

In his above assertion, the Examiner provides no documentary evidence for the official notice. As the Examiner is aware and as recited above, according to MPEP §2144.03, "...[o]fficial notice unsupported by documentary evidence should only be taken by the examiner where the facts asserted to be well-known, or to be common knowledge in the art are capable of

instant and unquestionable demonstration as being well known." Applicants submit that the claimed *translation system* using the COM standard is not well known, and thus, official notice is improper. Applicants request documentary evidence.

Applicants submit that Claim 4 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "...*the distributed object protocol* used by the client and translation engine operates in accordance with the common Object Request Broker Architecture (CORBA) standard," as set forth in Claim 4.

Applicants submit that Claim 14 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "...the notification mechanism comprises a callback interface having *at least one error callback object*, the callback interface defined by an IDL, and wherein the translation engine informs the client of an error occurring during translation by associating the error with the error-callback object," as set forth in Claim 14.

With regard to Claim 14, the Examiner assets that Kleinman et al. teaches an "error callback interface defined by an IDL... ." However, Kleinman et al. fails to teach the claimed *error callback object*. Applicants submit that the term "object" has particular meaning. As described, for example, at page 10, lines 6-9, the specification states "[a] software object is a collection of related functions (or intelligence) and the function's (or intelligence's) associated state. A set of distributed objects, such as a set including all of the objects in Fig. 2 (the client 11, translation engine 16, dictionary browser 46, etc.), is a collection of independently operating nodes."

Applicants submit that Claim 18 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... *a registration mechanism* by which the translation engine can register itself to be found by the client, the registration mechanism having an interface defined by an IDL," as set forth in Claim 18.

With regard to Claim 18, the Examiner asserts that Kleinman et al teaches "[a] registration mechanism that a translation engine can use to register itself to be located by a user...." The Examiner uses Kleinman et al. column 13, line 53 to column 15, line 2. The Examiner finds a "domain name" in Kleinman et al. Applicants can find no mention in Kleinman et al., of the claimed registration mechanism and submit that a domain name is not a "...registration mechanism having an interface defined by an IDL," as claimed.

Applicants submit that Claim 19 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... *the registration mechanism includes information relating to at least one component* available with the translation engine," as set forth in Claim 19.

Applicants submit that Claim 21 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "...the translation request further comprises information relating to a desired format of the translation and wherein the translation engine uses *a translation preferences object* responsive to the information for controlling how the translation engine processes the translation request from the client, *the translation preferences object having an interface defined by an IDL* ; wherein the translation engine generates a response to the translation request using *the distributed object protocol* in accordance with the desired format of the translation," as set forth in Claim 21. As described above in conjunction with Claim 14, Applicants submit that the term "object" has particular meaning. The claimed distributed object protocol is discussed above in conjunction with Claim 1.

Applicants submit that Claim 22 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "...a preference editor for permitting the client to input the desired format of the translation to the preference editor using the distributed object protocol, *the preference editor having an interface defined by an IDL*, wherein the preference editor provides the information relating to the desired format of the translation to the translation engine as *a translation preference object* using *a distributed object*

protocol," as set forth in Claim 22. As described above in conjunction with Claim 14, Applicants submit that the term "object" has particular meaning. The claimed distributed object protocol is discussed above in conjunction with Claim 1.

Applicants submit that Claim 23 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... the translation engine further comprises *a synchronous translator* for providing the client with an immediate response to the translation request using a distributed object protocol, the synchronous translator having an interface defined by an IDL," as set forth in Claim 23.

With regard to Claim 23, the Examiner asserts "official notice that real-time translators are well known ... ." The examiner concludes that "...it would have been obvious to one of ordinary skill in the art, at the time of invention, to utilize a real-time translation device in a network-based translation system... ." Applicants respectfully disagree.

In his above assertion, the Examiner provides no documentary evidence for the official notice. As the Examiner is aware and as recited above, according to MPEP §2144.03, "...[o]fficial notice unsupported by documentary evidence should only be taken by the examiner where the facts asserted to be well-known, or to be common knowledge in the art are capable of instant and unquestionable demonstration as being well known." Applicants submit that the claimed *translation system* using a synchronous translator is not well known, and thus, official notice is improper. Applicants request documentary evidence.

Claims 34-37, and 40 depend from and thus include the limitations of Claim 33. Thus, Applicants submit that Claims 34-37, and 40 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 33.

For the reasons discussed above in conjunction with Claim 19, Applicants submit that Claim 35 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... providing *a registration mechanism* by which

the translation engine can register itself to be found by the client, the registration mechanism having an interface defined by an IDL," as set forth in Claim 35.

Claims 42-43, 45-46, and 48 depend from and thus include the limitations of Claim 41. Thus, Applicants submit that Claims 42-43, 45-46, and 48 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 41.

For the reasons discussed above in conjunction with Claim 19, Applicants submit that Claim 43 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... *a registration mechanism* by which each of the plurality of translation engines can register itself to be found by the client using the distributed object protocol, the registration mechanism having an interface defined by an IDL," as set forth in Claim 43.

For the reasons discussed above in conjunction with Claims 3, Applicants submit that Claim 45 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... the distributed object protocol used by the plurality of translation engines and the client to communicate operates in accordance with *the COM standard*," as set forth in Claim 45.

Applicants submit that Claim 46 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... *the distributed object protocol* used by the plurality of clients and the translation engine to communicate operates in accordance with the CORBA standard," as set forth in Claim 46.

Claims 54-57, and 61-62 depend from and thus include the limitations of Claim 53. Thus, Applicants submit that Claims 54-57, and 61-62 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 53.

For the reasons discussed above in conjunction with Claims 3, Applicants submit that Claim 55 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... the distributed object protocol used by the plurality of clients and the translation engine to communicate operates in accordance with *the COM standard*," as set forth in Claim 55.

Applicants submit that Claim 56 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "...*the distributed object protocol* used by the plurality of clients and the translation engine to communicate operates in accordance with the CORBA standard," as set forth in Claim 56.

Applicants submit that Claim 61 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... the translation engine further comprises a plurality of *translation objects* for maintaining a separate context for each translation request that the translation engine receives, each translation object having an interface defined by an IDL," as set forth in Claim 61. As described above in conjunction with Claim 14, Applicants submit that the term "object" has particular meaning.

Applicants submit that Claim 62 is further patentably distinct over Hiroya et al., Clawson, and Kleinman et al., since the cited references neither describe nor suggest "... at least one of the plurality of *translation objects* is responsive to a translation request further comprising information relating to a desired format of the translation, and wherein the at least one *translation object* is responsive to the information so as to control how the translation engine processes the translation request," as set forth in Claim 62.

The Examiner also asserts that Hiroya et al., Clawson, and Kleinman et al. are analogous art "...because they are from a similar field of endeavor in text processing utilizing distributed processing." Applicants do not agree with the Examiner's assertion that Kleinman et al. involves "text processing." Furthermore, Kleinman et al. does not provide a translation from one *natural* language (e.g., English) into another *natural* language (e.g., Japanese). Therefore, Applicants

submit that Hiroya et al., Clawson, and Kleinman et al. represent non-analogous art and that one of ordinary skill in the art would, therefore, not be motivated to combine one with the other.

In view of the above, Applicants submit that the rejection of Claims 2-4, 14, 16, 18-23, 34-37, 40, 42-43, 45-46, 48, 54-57, and 61-62 under 35 U.S.C. §103(a) should be removed.

Hiroya et al. in View of Clawson and Kleinman et al. and Murata et al.

The Examiner rejects Claims 25-28 and 39 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. in view of Clawson, further in view of Kleinman et al., and further in view of Murata et al. (U.S. Patent number 5,987,402). The Examiner recognizes that a combination of Hiroya et al., Clawson, and Kleinman et al. does not suggest "...the use of an asynchronous translator... ." The Examiner relies upon Murata et al. as teaching the asynchronous translator. The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to modify the teachings of Hiroya in view of Clawson, and further in view of Kleinman with the means of providing a partial translation...as taught by Murata..."

Claims 25-28 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 25-28 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Applicants submit that Claim 26 is further patentably distinct over Hiroya et al., Clawson, Kleinman et al., and Murata et al. since the cited references neither describe nor suggest "... *the client polls the asynchronous translator using the distributed object protocol* for information relating to the progress of the translation," as set forth in Claim 26.

Applicants submit that Claim 27 is further patentably distinct over Hiroya et al., Clawson, Kleinman et al., and Murata et al. since the cited references neither describe nor suggest ".. the asynchronous translator provides to the client information relating to the progress of the

translation while the translation is occurring *using the distributed object protocol*," as set forth in Claim 27.

Applicants submit that Claim 28 is further patentably distinct over Hiroya et al., Clawson, Kleinman et al., and Murata et al. since the cited references neither describe nor suggest "... the client further comprises *a progress object* for receiving information from the translation engine regarding the progress of the generation of a response by the translation engine using the distributed object protocol, *the progress object having an interface defined by an IDL*," as set forth in Claim 28. As described above in conjunction with Claim 14, Applicants submit that the term "object" has particular meaning.

Claim 39 depends from and thus includes the limitations of Claim 33. Thus, Applicants submit that Claim 39 is patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 33.

Applicants submit that Claim 39 is further patentably distinct over Hiroya et al., Clawson, Kleinman et al., and Murata et al. since the cited references neither describe nor suggest "... providing information to the client regarding the progress of the generation of the response at the translation engine in accordance with *the distributed object protocol*," as set forth in Claim 39.

The Examiner also asserts that Hiroya et al., Clawson, Kleinman et al., and Murata et al. are analogous art "...because they are from a similar field of endeavor in network-based text processing applications." As described above, Applicants do not agree that Hiroya et al., Clawson, Kleinman et al., and Murata et al. involve analogous art.

In view of the above, Applicants submit that the rejection of Claims 25-28 and 39 under 35 U.S.C. §103(a) should be removed.

Hiroya et al. in View of Clawson and Kleinman et al. and Kuno et al.

The Examiner rejects Claims 29-32 and 49 under 35 U.S.C. §103(a) as being unpatentable over Hiroya et al. in view of Clawson, further in view of Kleinman et al., and further in view of Kuno et al. (U.S. Patent number 5,528,491). The Examiner recognizes that a combination of Hiroya et al. and Kleinman et al. does not suggest "...an alternate word or sentence locator." The Examiner relies upon Kuno et al. as teaching the alternate word or sentence locator. The Examiner concludes that "...it would have been obvious to a person of ordinary skill in the art...to modify the teachings of Hiroya in view of Clawson, and further in view of Kleinman with the method of providing an alternate translation request...as taught by Kuno... ."

Claims 29-32 depend from and thus include the limitations of Claim 1. Thus, Applicants submit that Claims 29-32 are patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 1.

Claim 49 depends from and thus includes the limitations of Claim 41. Thus, Applicants submit that Claim 49 is patentably distinct over the cited references at least for the reasons discussed above in conjunction with Claim 41.

The Examiner also asserts that Hiroya et al., Clawson, Kleinman et al., and Kuno et al. are analogous art "...because they are from a similar field of endeavor in text processing." As described above, Applicants do not agree that Hiroya et al., Clawson, Kleinman et al., and Kuno et al. involve analogous art.

In view of the above, Applicants submit that the rejection of Claims 29-32 and 49 under 35 U.S.C. §103(a) should be removed.

In view of the above Amendment and Remarks, Applicants submit that Claims 1-62 and the entire case are in condition for allowance and should be sent to issue and such action is respectfully requested.

The Examiner is respectfully invited to telephone the undersigning attorney if there are any questions regarding this Amendment or this application.

The Assistant Commissioner is hereby authorized to charge payment of any additional fees associated with this communication or credit any overpayment to Deposit Account No. 500845, including but not limited to, any charges for extensions of time under 37 C.F.R. §1.136.

Respectfully submitted,

Dated: May 24, 2005

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